

GUIDANCE MEMO ON REFERRING TO 2018 WEHRUM RECLASSIFICATION MEMO

ACTION REQUESTED

OECA AA joint signature with OAR AA on Memo to Regional Administrators providing guidance on how to refer to the 2018 Wehrum Reclassification Memo in Applicability Determinations (ADs).

BACKGROUND

OAQPS has drafted guidance on how writers of ADs should refer to the 2018 Wehrum Memo in any formal Agency responses. Because OECA and the Regional Administrators currently have delegation for issuing ADs, OAQPS asked OECA to issue the memo. After discussion with OC management, we proposed a joint signature given the political nature of the original memo.

OGC and OCE/OC have also provided edits/comments on the text of the memo.

OAR has briefed the memo up and is prepared for immediate signature, so they are asking for an expeditious review/briefing process.